

Office of the City Attorney  
Cris Meyer, City Attorney, No. 012262  
200 West Washington, Suite 1300  
Phoenix, Arizona 85003-1611  
Telephone (602) 262-6761  
law.civil.minute.entries@phoenix.gov

Garrett Griggs, No. 030525  
Assistant City Attorney  
Attorney for Defendants David Snow, Joshua Mesquita, and City of Phoenix Police  
Department

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Joshua Baker, a single man; and Todd  
Brown, a single man,

Plaintiff(s),

vs.

Officer Snow (06255), Officer Mesquita  
(0852), City of Phoenix Police  
Department, Employees I-X and Black  
and White Corporations I-X,

Defendants.

Case No. \_\_\_\_\_

(Maricopa County Case No. CV2019-000180)

**NOTICE OF REMOVAL**

Defendants David Snow, Joshua Mesquita, and City of Phoenix Police Department  
("City Defendants"), through undersigned counsel, and pursuant to 28 U.S.C. § 1441(a)  
and LRCiv 3.6, hereby notices the removal of the above referenced action commenced  
and now pending in the Superior Court of the State of Arizona, in and for the County of  
Maricopa entitled *Joshua Baker, a single man; and Todd Brown, a single man,*

1 *Plaintiff(s), vs. Officer Snow (06255), Officer Mesquita (0852), City of Phoenix Police*  
2 *Department, Employees I-X and Black and White Corporations I-X, Defendants, Civil*  
3 *Action No. CV2019-000180, and in support of removal asserts the following:*

4  
5 1. Petitioners are Defendants in the Superior Court of the State of Arizona in  
6 and for the County of Maricopa under the caption *Joshua Baker, a single man; and Todd*  
7 *Brown, a single man, Plaintiff(s), vs. Officer Snow (06255), Officer Mesquita (0852),*  
8 *City of Phoenix Police Department, Employees I-X and Black and White Corporations I-*  
9 *X, Defendants, Maricopa County Superior Court Case No. CV2019-000180. Copies of*  
10 *the Complaint and all other documents previously filed in this matter are in **Exhibit A** of*  
11 *the Index filed simultaneously with this pleading.*

12 2. The first date upon which Defendant Dejan Nadzakovic received a copy of  
13 the Complaint was March 20, 2019.

14 3. Plaintiffs have asserted a claim of violation of their Civil Rights under 42  
15 U.S.C. §1983 and a violation of their Fourth Amendment rights.

16 4. This Notice of Removal is being filed within 30 days after Service of the  
17 Summons and Complaint and is therefore timely under 28 U.S.C. § 1446(b).

18 5. A Notice of Filing of Notice of Removal has been filed in the Arizona  
19 Superior Court, County of Maricopa, on behalf of Defendant. A true and correct copy of  
20 the Notice is in **Exhibit B** of the Index filed simultaneously with this pleading.

21 WHEREFORE, Defendant respectfully requests that the above action now  
22 pending in the Arizona Superior Court, Maricopa County, be removed to this Court.

23 ...

1 DATED this 9<sup>th</sup> day of April, 2019.

2 Office of the Phoenix City Attorney  
3 Cris Meyer, City Attorney

4 By: /s/ Garrett Griggs  
5 Garrett Griggs  
6 Assistant City Attorney  
7 200 West Washington, Suite 1300  
8 Phoenix, Arizona 85003-1611  
9 Attorney for Defendants David Snow, Joshua  
10 Mesquita, and City of Phoenix Police  
11 Department

12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on April 9, 2019, I served the attached document by email on  
14 the following:

15 Percival Bradley, Esq.  
16 Bradley & Associates  
17 Attorneys at Law, P.L.C.  
18 P.O. Box #2213  
19 Litchfield Park, AZ 85340  
20 Attorney for Plaintiffs

21 /s/ Carol Aparicio  
22 2103174  
23  
24

# EXHIBIT A

Clerk of the Superior Court

By Ashley Hatch, Deputy

Date 01/15/2019 Time 11:14:41

Description	Amount
CASE# CV2019-000180	
CIVIL NEW COMPLAINT	333.00
TOTAL AMOUNT	333.00
Receipt# 26991580	

**BRADLEY & ASSOCIATES**  
**Attorneys at Law, P.L.C.**  
**P.O. Box, #2213**  
**Litchfield Park, AZ 85340**  
**(602) 266-2929 Fax (602) 467-3105**

**Percival R. Bradley**  
**State Bar No. 017149**  
**Attorney for: Plaintiffs**

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
**IN AND FOR THE COUNTY OF MARICOPA**

**JOSHUA BAKER, a single man; and**  
**TODD BROWN, a single man;**

**Plaintiffs,**

**vs.**

**OFFICER SNOW(06255), OFFICER**  
**MESQUITA(0852), CITY OF PHOENIX**  
**POLICE DEPARTMENT, EMPLOYEES I-**  
**X and BLACK AND WHITE**  
**CORPORATIONS I-X,**

**Defendants.**

**Case No.**

**CV 2019-000180**

**COMPLAINT**

**(Tort/Non-Auto)**

Plaintiffs, as and for their cause of action against the Defendants, complain and  
 allege as follows:

**I.**

Plaintiffs, are African American residents of Maricopa County, Arizona.

**II.**

All acts complained of herein transpired in Maricopa County, Arizona.

**III.**

Defendants at all times relevant to the incidents alleged were acting under color  
 of authority.

**IV.**

Defendants at all times relevant to the incidents alleged were employed as officers with the City of Phoenix Police Department.

**V.**

Defendants at all times of relevant to the incidents alleged were on duty as detectives of the City of Phoenix Police Department.

**VI.**

Employees I-X, are designated by fictitious names and at all times relevant to the incidents alleged herein were employed by City of Phoenix Police Department . These Defendants are designated by fictitious names pursuant to Rule 10 (f) of the Arizona Rules of Civil Procedures as their true names are unknown to Plaintiffs. By designating them under fictitious names, Plaintiffs preserve the right to formally name them as the identities become known.

**VII.**

Employees I-X at all times relevant to the incidents alleged herein were acting within the scope of their employment with City of Phoenix Police Department.

**VIII.**

On February 15, 2018 at approximately 4:45 p.m., Joshua Baker, Todd Brown and their friend were all riding in a 1999 gold Chrysler Sebring. Joshua was driving as they were on the way to drop Todd off at work. As Joshua pulled into the parking lot of the Salvation Army, located at 1375 E. Broadway road, a police car pulled in behind him with no visible lights or sirens. As Mr. Baker slowed to a stop officers jumped out of the vehicle and ran up to the car. The officers immediately pulled all three men from the car, even before it was fully in park. By this time a second police vehicle pulled up with more officers. All three men were slammed against the car, handcuffed and placed on the curb.

1 The police responded this way despite the fact that the men did not try to  
2 evade, were not traveling at excessive speeds and had no idea they were being  
3 followed by the police. The men were stopped for an alleged traffic violation. The  
4 men were pulled from the vehicle without giving them the opportunity to provide  
5 license, registration and insurance.

6 The officers were verbally abusive, responding to questions of 'what did we do',  
7 with "you know what the f\*\*k you did". They accused the men of being in a gang.  
8 None of the men offered any kind of resistance.

9 IX.

10 While detaining Plaintiffs Defendants conducted a search of their persons  
11 without probable cause or reasonable suspicion.

12 X.

13 While detaining Plaintiffs Defendants conducted an unauthorized search of the  
14 vehicle without probable cause or reasonable suspicion.

15 LIABILITY

16 XI.

17 Defendants' actions violated 42 U.S.C. 1983 by depriving Plaintiffs of their right  
18 to be free from unlawful search and seizure as secured by the constitution.

19 XII.

20 At the time of the incident Defendants were employed with the Phoenix police  
21 department and acting in their official capacity.

22 XIII.

23 Defendant Phoenix police were negligent in their hiring, training and supervision  
24 of Defendants.

BRADLEY & ASSOCIATES  
Attorneys at Law, P.L.C.  
210 East Catalina Drive  
Phoenix, AZ 85012

**XIV.**

Defendant Phoenix police were negligent in the enforcement of the department's policy and procedures relating to the prevention of officers violating the civil rights of citizens.

**XV.**

Defendants without reasonable suspicion of criminal activity detained plaintiffs longer than reasonably necessary to conduct a traffic stop.

**XVI.**

Defendants without probable cause detained Plaintiffs under the ruse of a traffic stop for the sole purpose of conducting a search.

**XVII.**

Defendants conducted a vehicle search without probable cause in the absence of consent written or otherwise.

**XVIII.**

Defendants' actions amounted to selective enforcement of the traffic laws.

**XIX.**

The stopping of three African American citizens without probable cause and their subsequent detention and illegal search amounted to racial profiling.

**XX.**

City of Phoenix was negligent in the hiring, training, and placement of defendants.

**XXI.**

Defendants were negligent in the enforcement of the department's policy and procedure to prevent illegal searches and racial profiling.

**XXII.**

City of Phoenix Police Department has a prior history of officers engaging in acts of racial profiling.



**DAMAGES**

**XXIII.**

As a direct and proximate result of defendants' negligence, and willful misconduct, plaintiffs suffered emotional distress.

**XXIV.**

As a direct and proximate result of defendants negligence, and willful misconduct, plaintiffs civil and constitutional rights were violated.

**XXV.**

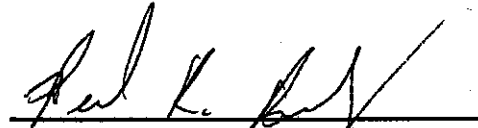
As a direct and proximate result of defendants' negligence, plaintiffs freedom, privacy and movement were unlawfully restricted.

WHEREFORE, Plaintiffs pray for Judgment against the Defendants as follows:

1. For such sums and for general damages as my be just and fair;
2. For punitive damages;
3. For costs incurred herein and accruing, together with interest at the highest lawful rate;
4. For such other and further relief as the Court may deem just and proper.

Dated this \_\_15th\_\_ day of January, 2019.

BRADLEY & ASSOCIATES P.L.C.




Percival R. Bradley, Esq.  
Attorney for Plaintiffs

**ORIGINAL** filed this  
\_\_\_\_ day of January, 2019 at:

Clerk of Superior Court  
201 W. Jefferson  
Phoenix, Arizona 85003

BRADLEY & ASSOCIATES  
Attorneys at Law, P.L.C.  
210 East Catalina Drive  
Phoenix, AZ 85012

CHRIS DEROSE, CLERK  
BY  DEP  
A. HATCH, FILED

19 JAN 15 AM 11:14

1 **BRADLEY & ASSOCIATES**  
2 **Attorneys at Law, P.L.C.**  
3 **P.O. Box #2213**  
4 **Litchfield Park, AZ 85340**  
5 **(602) 266-2929 Fax 258-5070**  
6 **Percival R. Bradley**  
7 **State Bar No. 017149**  
8 **Attorney for: Plaintiff**

9  
10  
11 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
12 **IN AND FOR THE COUNTY OF MARICOPA**

13  
14 **JOSHUA BAKER, a single man; and**  
15 **TODD BROWN, a single man;**

16 **Plaintiffs,**

17 **vs.**

18  
19 **OFFICER SNOW(06255), OFFICER**  
20 **MESQUITA(0852), CITY OF PHOENIX**  
21 **POLICE DEPARTMENT, EMPLOYEES I-**  
22 **X and BLACK AND WHITE**  
23 **CORPORATIONS I-X,**

24 **Defendants.**

**Case No.**

**CV 2019-000180**

**CERTIFICATE OF ARBITRATION**

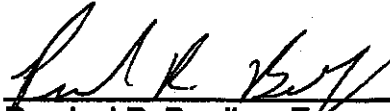
**(Tort Non-Auto)**

25  
26 **COMES NOW, Plaintiffs, by and through counsel undersigned, and pursuant to**  
27 **the Mandatory Alternative Discovery Track, hereby submits the following:**

28  
29 **The undersigned certifies that this action is not subject to compulsory**  
30 **arbitration pursuant to the Uniform Rules of Procedure of Arbitration and Local Rule.**  
31 **No party seeks affirmative relief other than a monetary judgment, and the award**  
32 **sought is in excess of the jurisdictional limit for arbitration set by this Court, including**  
33 **punitive damages but excluding interest, attorney's fees or costs.**

1 DATED this \_\_\_\_15th\_\_\_\_ day of January, 2019.

2  
3  
4  
5  
6 BRADLEY & ASSOCIATES

7   
8 Percival R. Bradley, Esq.  
9 Attorney for Plaintiff  
10

11  
12  
13  
14  
15  
16 ORIGINAL filed this  
17 \_\_\_\_day of January, 2019 at:

18 Clerk of the Court  
19 MARICOPA COUNTY SUPERIOR COURT  
20 201 West Jefferson Street  
21 Phoenix, Arizona 85201  
22  
23  
24  
25  
26  
27  
28  
29

BRADLEY & ASSOCIATES  
Attorneys at Law, P.L.C.  
210 East Catalina Drive  
Phoenix, AZ 85012

CHRIS DEROSE, CLERK

BY A. HATCH DEP

In the Superior Court of the State of Arizona

In and For the County of \_\_\_\_\_

Case Number \_\_\_\_\_

**CV2019-000180**

Plaintiff's Attorney

Percival R. Bradley

Attorney Bar Number

017149Is Interpreter Needed? ☐ Yes

A. HATCH FILED

If yes, what language(s): \_\_\_\_\_

19 JAN 15 AM 11:14

Plaintiff's Name(s): (List all)

Plaintiff's Address:

Phone #:

Email Address:

Joshua BakerTodd Brown

(List additional Plaintiffs on page two and/or attach a separate sheet).

Defendant's Name(s): (List All)

Officer Snow (06253)Officer Mesquita (0852)City of Phoenix Police Department

(List additional Defendants on page two and/or attach a separate sheet)

**RULE 26.2 DISCOVERY TIER OR MONETARY RELIEF CLAIMED:**

**IMPORTANT:** Any case category that has an asterisk (\*) **MUST** have a dollar amount claimed or Tier selected. State the monetary amount in controversy or place an "X" next to the discovery tier to which the pleadings allege the case would belong under Rule 26.2.

☐ Amount Claimed \$ \_\_\_\_\_☐ Tier 1☒ Tier 2☐ Tier 3**NATURE OF ACTION**

Place an "X" next to the one case category that most accurately describes your primary case. Any case category that has an asterisk (\*) **MUST** have a dollar amount claimed or Tier selected as indicated above.

**100 TORT MOTOR VEHICLE:**☐ 101 Non-Death/Personal Injury\*☐ 102 Property Damage\*☐ 103 Wrongful Death\*

**110 TORT NON-MOTOR VEHICLE:**

- ☐ 111 Negligence\*
- ☐ 112 Product Liability – Asbestos\*
- ☐ 112 Product Liability – Tobacco\*
- ☐ 112 Product Liability – Toxic/Other\*
- ☒ 113 Intentional Tort\*
- ☐ 114 Property Damage\*
- ☐ 115 Legal Malpractice\*
- ☐ 115 Malpractice – Other professional\*
- ☐ 117 Premises Liability\*
- ☐ 118 Slander/Libel/Defamation\*
- ☐ 116 Other (Specify) \_\_\_\_\_ \*

**120 MEDICAL MALPRACTICE:**

- ☐ 121 Physician M.D.\*      ☐ 123 Hospital\*
- ☐ 122 Physician D.O.\*      ☐ 124 Other\*

**130 & 197 CONTRACTS:**

- ☐ 131 Account (Open or Stated)\*
- ☐ 132 Promissory Note\*
- ☐ 133 Foreclosure\*
- ☐ 138 Buyer-Plaintiff\*
- ☐ 139 Fraud\*
- ☐ 134 Other Contract (i.e. Breach of Contract)\*
- ☐ 135 Excess Proceeds-Sale\*
- ☐ Construction Defects (Residential/Commercial)\*
- ☐ 136 Six to Nineteen Structures\*
- ☐ 137 Twenty or More Structures\*
- ☐ 197 Credit Card Debt (Maricopa County Only)\*

**150-199 OTHER CIVIL CASE TYPES:**

- ☐ 156 Eminent Domain/Condemnation\*
- ☐ 151 Eviction Actions (Forcible and Special Detainers)\*
- ☐ 152 Change of Name
- ☐ 153 Transcript of Judgment
- ☐ 154 Foreign Judgment

- ☐ 158 Quiet Title\*
- ☐ 160 Forfeiture\*
- ☐ 175 Election Challenge
- ☐ 179 NCC-Employer Sanction Action (A.R.S. §23-212)
- ☐ 180 Injunction against Workplace Harassment
- ☐ 181 Injunction against Harassment
- ☐ 182 Civil Penalty
- ☐ 186 Water Rights (Not General Stream Adjudication)\*
- ☐ 187 Real Property \*
- ☐ Special Action against Lower Courts  
(See Lower Court Appeal cover sheet in Maricopa)
- ☐ 194 Immigration Enforcement Challenge  
(A.R.S. §§1-501, 1-502, 11-1051)

**150-199 UNCLASSIFIED CIVIL:**

- ☐ Administrative Review  
(See Lower Court Appeal cover sheet in Maricopa)
- ☐ 150 Tax Appeal  
(All other tax matters must be filed in the AZ Tax Court)
- ☐ 155 Declaratory Judgment
- ☐ 157 Habeas Corpus
- ☐ 184 Landlord Tenant Dispute – Other\*
- ☐ 190 Declaration of Factual Innocence (A.R.S. §12-771)
- ☐ 191 Declaration of Factual Improper Party Status
- ☐ 193 Vulnerable Adult (A.R.S. §46-451)\*
- ☐ 165 Tribal Judgment
- ☐ 167 Structured Settlement (A.R.S. §12-2901)
- ☐ 169 Attorney Conservatorships (State Bar)
- ☐ 170 Unauthorized Practice of Law (State Bar)
- ☐ 171 Out-of-State Deposition for Foreign Jurisdiction
- ☐ 172 Secure Attendance of Prisoner
- ☐ 173 Assurance of Discontinuance
- ☐ 174 In-State Deposition for Foreign Jurisdiction
- ☐ 176 Eminent Domain– Light Rail Only\*
- ☐ 177 Interpleader– Automobile Only\*
- ☐ 178 Delayed Birth Certificate (A.R.S. §36-333.03)
- ☐ 183 Employment Dispute- Discrimination\*

☐ 185 Employment Dispute-Other\*

☐ 163 Other\* \_\_\_\_\_

☐ 196 Verified Rule 45.2 Petition

(Specify)

☐ 195(a) Amendment of Marriage License

☐ 195(b) Amendment of Birth Certificate

**EMERGENCY ORDER SOUGHT**

☐ Temporary Restraining Order

☐ Provisional Remedy

☐ OSC

☐ Election Challenge

☐ Employer Sanction

☐ Other (Specify) \_\_\_\_\_

**COMMERCIAL COURT (Maricopa County Only)**

☐ This case is eligible for the Commercial Court under Rule 8.1, and Plaintiff requests assignment of this case to the Commercial Court. More information on the Commercial Court, including the most recent forms, are available on the Court's website at:

<https://www.superiorcourt.maricopa.gov/commercial-court/>.

**Additional Plaintiff(s):**

\_\_\_\_\_  
\_\_\_\_\_

**Additional Defendant(s):**

\_\_\_\_\_  
\_\_\_\_\_

Arizona Process Service L.L.C.  
70 S. Val Vista Dr. Suite A3336  
Gilbert, AZ 85296  
480-430-5556

CLERK OF THE  
SUPERIOR COURT  
RECEIVED SE  
DOCUMENT DEPOSITORY

2019 MAR 26 PM 1:12

FILED  
BY L. GUTIERREZ, DEP

SUPERIOR COURT OF ARIZONA  
MARICOPA COUNTY

In Re the Matter of:

**JOSHUA BAKER, a single man; and  
TODD BROWN, a single man;**

Case No. CV2019-000180

**CERTIFICATE OF SERVICE**

Plaintiffs,

Vs.

**OFFICER SNOW(06255), OFFICER  
MESQUITA(0852), CITY OF PHOENIX POLICE  
DEPARTMENT, EMPLOYEES I-X and BLACK  
AND WHITE CORPORATIONS I-X**


Defendants.

I, Oscar Miller do depose that on said date March 18, 2019. I received documents listed below from Bradley & Associates Law Office requesting regular service of process.

I, Oscar Miller do depose that on said date, March 20, 2019 at 10:36 A.M., I hand delivered and served a copy of the **SUMMONS (Tort Non-Auto); COMPLAINT (Tort/Non-Auto); CERTIFICATE OF ARBITRATION (Tort Non-Auto)** to Phoenix Police Department by serving City of Phoenix City Clerk's Office to Connie Haesloop who is the Special Deputy City Clerk for the City Clerk Department; Said documents were hand delivered and served at the address of the City Clerk Department 200 W. Washington Street, 15<sup>th</sup> Floor, Phoenix, AZ 85003.

Connie Haesloop's physical description is as follows: Hispanic female, approximately 50-60 years of age, 5'3" tall and 140 pounds with brown hair.

I declare under the penalty of perjury that the above information is correct and true to the best of my knowledge. A fee of \$95.00 was charged for this Service of Process.



Certified Officer Superior Court  
Registered in Maricopa County, AZ  
Oscar Miller # 7421



MICHAEL K. JEANES Clerk of the Superior Court By Alejandro Fimbres, Deputy Date 01/03/2018 Time 14:04:54	
Description	Amount
----- CASE# CV2018-093038 -----	
ATTL NEW COMPLAINT Clerk's Use	32100 D
TOTAL AMOUNT	0.00
Receipt# 26338857	

Person Filing: Erick Dodakian  
 Address (if not protected): 4406 E Main ST STE 102-100  
 City, State, Zip Code: Mesa AZ 85205  
 Telephone: \_\_\_\_\_  
 Email Address: e.dodakian  
 Lawyer's Bar Number: \_\_\_\_\_

Representing ☐ Self, without a Lawyer or ☐ Attorney for ☐ Petitioner OR ☐ Respondent

## SUPERIOR COURT OF ARIZONA IN MARICOPA COUNTY

CV 2018-093038

Erick Dodakian  
 Name of Plaintiff

Case Number: \_\_\_\_\_

Title: **CIVIL COMPLAINT**

Baron Gelwicks  
 Name of Defendant

Plaintiff hereby submits this complaint against Defendant(s) and alleges the following:

### JURISDICTION and VENUE

1. Maricopa County Superior Court has the legal authority to hear and decide this case because: (Check all boxes that are true.)

- ☐ The value of this case exceeds \$10,000 dollars.
- ☐ Replevin or other nonmonetary remedy will take place in Maricopa County.
- ☐ The Plaintiff resides in Maricopa County.
- ☐ The Defendant resides in Maricopa County.
- ☐ The Defendant does business in Maricopa County.
- ☒ The events, actions, or debts subject of this Complaint occurred in Maricopa County.
- ☐ Other reason: \_\_\_\_\_

**PARTIES**

2. The Plaintiff in this case is Erick Dodakian

3. The Defendant in this case is Baron Gelwicks

**STATEMENT OF FACTS AND BREACH**

4. Erick Dodakian sustained a further  
spinal Injury due to the assault

5. that took place in a Parking lot at  
Westgate. Medical file and 911 call

6. will be submitted as evidence.

7. \_\_\_\_\_

8. \_\_\_\_\_

9. \_\_\_\_\_

(If you need more space, add an attachment labeled "Statement of Facts and Breach," and continue consecutive numbering.)

**APPLICABLE LAW SUPPORTING CLAIMS**

( ) 13-1204 Aggravated assault:

A. A person commits aggravated assault if the

( ) person commits assault as prescribed by  
Section 13-1203 under any of the following circumstance:

- ( 1 ) - If the person causes serious physical injury to another
- ( 2 ) If the person uses a deadly weapon or dangerous instrument
- ( 3 ) If the person commits the assault by means of force that causes, temporary, but
- ( ) Substantial disfigurement, temporary but substantial loss or impairment of any body organ or part or a fracture of any body part;

(If you need more space, add an attachment labeled "Applicable Laws Supporting Claims," and continue consecutive numbering.)

### INJURIES

- ( ) Erick Dodakian sustained further a spinal injury due to the assault
- ( ) that took place in a parking lot at Westgate. Medical file, and 911
- ( ) call will be submitted as evidence.

( ) \_\_\_\_\_

( ) \_\_\_\_\_

(If you need more space, add an attachment labeled "Injuries," and continue consecutive numbering.)

### DEMAND FOR RELIEF

**WHEREFORE**, Plaintiff demands judgment against defendant(s), and each of them (if applicable) for the following dollars, interest, costs and expenses incurred herein, or non-monetary remedy, including reasonable attorneys' fees, and for such other and further relief as the Court may deem just and proper.

( ) \_\_\_\_\_  
\_\_\_\_\_  
( ) \_\_\_\_\_  
\_\_\_\_\_  
( ) \_\_\_\_\_  
\_\_\_\_\_  
( ) \_\_\_\_\_  
\_\_\_\_\_

(If you need more space, add an attachment labeled "Demand for Relief," and continue consecutive numbering.)

**DEMAND FOR JURY TRIAL (Optional)**

☐ I request a jury trial, and wrote this in the "Title" below the words "Civil Complaint."

Dated this Jan 3 2018  
(Date of signature)

A. Dodakian  
(Signature of Plaintiff or Plaintiff's Attorney)

## EXHIBIT B

Office of the City Attorney  
Cris Meyer, City Attorney, No. 012262  
200 West Washington, Suite 1300  
Phoenix, Arizona 85003-1611  
Telephone (602) 262-6761  
law.civil.minute.entries@phoenix.gov

Garrett Griggs, No. 030525  
Assistant City Attorney  
Attorney for Defendants David Snow, Joshua Mesquita, and City of Phoenix Police  
Department

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA

JOSHUA BAKER, a single man; and  
TODD BROWN, a single man,

Plaintiff(s),

vs.

OFFICER SNOW (06255), OFFICER  
MESQUITA (0852), CITY OF  
PHOENIX POLICE DEPARTMENT,  
EMPLOYEES I-X and BLACK AND  
WHITE CORPORATIONS I-X,

Defendants.

Case No. CV2019-000180

**DEFENDANTS' NOTICE OF FILING  
NOTICE OF REMOVAL**

(Assigned to the Honorable Teresa Sanders)

Defendants David Snow, Joshua Mesquita, and City of Phoenix Police  
Department, ("City Defendants") by and through undersigned counsel, and pursuant to  
28 U.S.C. §1441, et seq., hereby notify this Court that they have filed a Notice of  
Removal of this action to the United States District Court for the District of Arizona. A  
copy of the Notice of Removal filed April 5, 2019, is attached as **Exhibit A**.

OFFICE OF THE CITY ATTORNEY  
200 West Washington, Suite 1300  
Phoenix, Arizona 85003-1611  
(602) 262-6761

1 DATED this 9<sup>th</sup> day of April, 2019.

2  
3 Office of the Phoenix City Attorney  
4 Cris Meyer, City Attorney

5  
6 By: /s/ Garrett Griggs  
7 Garrett Griggs  
8 Assistant City Attorney  
9 200 West Washington, Suite 1300  
10 Phoenix, Arizona 85003-1611  
11 Attorney for Defendants David Snow, Joshua  
12 Mesquita, and City of Phoenix Police  
13 Department

14 Original of the foregoing electronically  
15 filed and COPY electronically served on  
16 April 9, 2019, to:

17 Percival Bradley, Esq.  
18 Bradley & Associates  
19 Attorneys at Law, P.L.C.  
20 P.O. Box #2213  
21 Litchfield Park, AZ 85340  
22 Attorney for Plaintiffs

23 By: /s/ Carol Aparicio  
24 2103175